

UNITED STATE DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
GREG HOLLAND,

Plaintiff,

RULE 26(a)(1) DISCLOSURES

-against-

Index No. 18 Civ. 6697

THOMAS MATOS, Nanci Matos and
BESTLIFE GIFTS LLC,

Defendants.

----- X
Defendants, through their attorneys Jacobowitz & Gubits, LLP, makes the following initial disclosures pursuant to FRCP 26(a)(1), reserving the right to supplement these disclosures as more information and documents become available through the course of discovery:

GENERAL PRELIMINARY OBJECTIONS

By providing any information, Defendants does not concede the materiality of the subject to which it refers. Defendants responses and disclosures are made expressly subject to, and without waiving or intending to waive, any questions or objections as to the competency, relevancy, materiality, privilege, or admissibility as evidence or for any other purpose, of any of the information produced or identified in any proceeding including the trial of this action or any subsequent proceeding.

1. Defendants object to the extent that any material that would otherwise be disclosed in these Initial Disclosures is protected by the attorney-client or work-product privilege.

2. Identification of any document that is privileged or is otherwise immune from discovery shall not constitute a waiver of any privilege or of any other ground for objecting to discovery with respect to that document or any other document, or its subject matter, or the

information contained therein, or of Defendants rights to object to the use of any such document or the information contained therein during any proceeding in this litigation or otherwise.

3. Defendants are continuing to search for documents and information relevant to this litigation and therefore reserves the right to supplement these disclosures if necessary, and as required by Federal Rule of Civil Procedure 26(e). Defendants also reserve the right to object to the future disclosure of any such documents and/or information.

I. RULE 26(a)(1)(A)(i) DISCLOSURES

1. **JADE HOLLAND**, c/o Kent, Beatty & Gordon LLP, Eleven Times Square, New York, New York 10036.

A. She possesses information regarding the relationship between the parties and the formation, operation and distribution of Ministry Ideaz, LLC.

B. In December of 2017 while she was in control she sent a memo stating they would be closing the store.

C. She was fully aware that Mr. Holland was always in control of the books and all money matters.

E. She knew about the store transfer in February of 2018

F. Fully aware of Mr. Hollands disfellowshipping (Removal of Mr. Holland as one of Jehovah's Witnesses).

2. **CHELSEA BRAUN**, (250) 902-8833.

A. Employee of Greg Holland.

B. Chelsea helped coordinate transfer of shipping for the online business from Pine Bush.

C. Fully aware of Mr. Hollands disfellowshipping.

3. **AMY HOLLAND**, 2860 Canyon Park P1, Victoria BC V9B 4Z4, Canada, #250-514-6372.

A. She was customer service for Ministry Ideaz.

B. She drafted initial letter which was posted on Ministry Ideaz website announcing the amicable transfer of Ministry Ideaz LLC store to Thomas and Nanci Matos. The message stated Ministry Ideaz did this as part of their simplification.

4. **DEL WATIER**, 4420 46 Ave Olds Alberta T4H 1A1, #403-554-8669 delwatier@gmail.com.

A. Worked remotely for Ministry Ideaz from Mexico.

5. **LAVERNE HOLLAND**, 2860 Canyon Park P1, Victoria BC V9B 4Z4, Canada 250-818-1200.

A. Has first hand knowledge of when and why Greg Holland was expelled from the congregation in January of 2018.

6. **KATHERINE MOECKEL**, P.O. Box 1094, 308-B County Road-D, Seminole, TX 79360, #620-931-0246.

A. Trusted employee of Ministry Ideaz.

B. Katherine Moekel was the liaison regarding the partnership with Mr. Holland and Ministry Ideaz. Shortly after a call was received and a proposition from Mr. Holland which was accepted in or about February of 2017.

D. Mrs. Moekel is also a full time Pioneer and her husband an Elder in the organization.

7. **STEVEN CHAPMAN**, 55 New Street, Upper Apt, Pine Bush, New York, 12566 #408-472-1847. stevenchapman222@aol.com.

A. His job was specifically shipping and receiving.

- B. Steven is also an Elder in the congregation of Jehovah's Witnesses in Pine Bush.
- C. He was aware that Mr. Holland had been working to remove shipping from the store long before transfer of ownership.
- D. After the store was acquired Steven stayed on with the defendants at BestLife Gifts.
- E. As one of the leaders in the organization he can testify about Mr. Hollands disfellowshipped condition and how it would make it impossible to stay in business with someone in his state due to the nature of the customer base.

8. CARRIE **CRITCHLEY**, 3384 Turnstone Drive, Victoria BC V9C 0B4, Canada.
#250-472-7246.

- A. Worked as a design artist for Greg Holland.
- B. Ms. Critchley is also one of Jehovah's Witnesses. Since her brother Greg Holland was expelled from the congregation, she no longer supplies him with product which is customized greeting cards.

C. Ms. Critchley's company continues to do business with BestLife Gifts.

9. CRISTIAN TACO. Last known email cristian@ministryideaz.com.

- A. Longtime employee of Mr. Greg Holland
- B. Also expelled from Jehovah's Witnesses.

10. KAREN SKINNER, 85 Dickson Street #3, Newburgh, New York, 12550,
(845) 562-2939

- A. Owner of Continental printing Tom & Nanci Matos met before Greg Holland

does printing for us.

B. Is aware of what transpired between Mr. Holland and the Matos's.

11. **MARTIN S. NOWAK, JR., Accounting**, 386 Ingrassia Road Middletown, New York, 10940, (845) 344-4719.

A. Bookkeeping for Ministry Ideaz LLC. Upon review Greg Holland decided they would cost too much for those services. He made the decision to take care of bookkeeping himself from the very beginning.

B. The decision was made to use Nowak Accounting in an accounting capacity and for filing taxes.

C. Mr. Holland stayed in contact with this company providing all bookkeeping information for the filing of 2018 taxes.

E. Mr. Holland presented any and all information to Nowak Accounting and Mr. Holland solely signed off on the filing of taxes.

12. **OFFICERS AND EMPLOYEES OF PAX 10 LLC**, P.O. Box 170, East Station, Yonkers, New York 10704.

A. They bought the strip mall that was previously owned by Moriano Trust. The place where Ministry Ideaz LLC and now BestLife Gifts operates from.

13. **PEGGY Y. HWANG FUNG, (Peglala, Inc.)**, P. O. Box 92587, City of Industry, California, 91715-2587, #626-863-7347.

A. Business Owner Supplier. Peggy developed various products specifically for Jehovahs Witnesses.

II. RULE 26(a)(1)(A)(ii)

Matos may use the following categories of documents or information in his possession,

custody, or control to support his claims or defenses.

1. Documents and communications concerning the formation, operation, and management of and dissolution of Ministry Ideaz, LLC.
2. Documents and communications relating to the negotiation, drafting, execution and performance of the March 5, 2018 Agreement between Holland and Mr. and Mrs. Matos. The above-referenced documents are located in Matos' office, Pine Bush, New York and the offices of Jacobowitz & Gubits, LLP, New York.

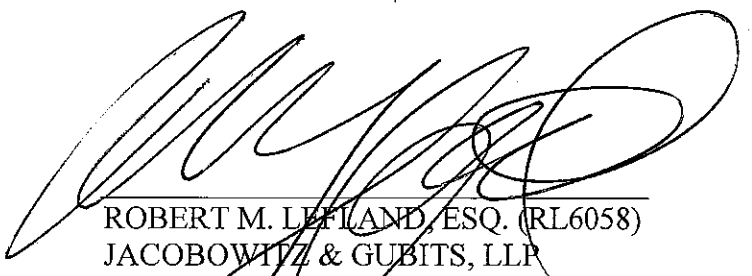
III. RULE 26(a)(1)(A)(iii)

Matos seeks damages for the breaches of the Ministry Ideaz LLC Operating Agreement, breaches of fiduciary duties, and unfair competition.

RULE 26(a)(1)(A)(iv)

Matos is aware of no insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy such a judgment.

Dated: January 31, 2019
Walden, New York



ROBERT M. LEFLAND, ESQ. (RL6058)
JACOBOWITZ & GUBITS, LLP
Attorneys for Defendants
158 Orange Avenue
P.O. Box 367
Walden, New York 12586
(845) 778-2121
rml@jacobowitz.com

TO: JACK A. GORDON, ESQ., LUIS F. CALVO, ESQ.
KENT, BEATTY & GORDON, LLP
Attorneys for Plaintiff
Eleven Times Square
New York, New York 10036
jag@kbg-law.com
Lfc@kbg-law.com
(212) 421-4300